



Ethical charter

Silec Cable SAS

Behaviors to adopt in our professional relationships including the Sustainable Procurement policy



TABLE OF CONTENTS

1- Letter from the General Manager	2
2- Our values.....	3
3- Code of Ethics and Business Conduct.....	3
4- The Sustainable Procurement Policy.....	4

Edition: 02/ 2018		
Written by: F. DOUCHE / B. PICHON	Checked by: B. PICHON	Approved by: MT. BLANOT / C. GUERY

1- Letter from the General Manager

Since 1932, together we have made Silec Cable into a recognized and valued company in the business of designing, manufacturing and installing electric and communications cables. Proud to have joined the General Cable group in 2005, our company is growing stronger every day in the domestic market and it has accelerated its international development.

Our successful development and integration into the General Cable group requires us to make an extra effort in how we work on a day-to-day basis and the brand image we convey. Safety, Caring, Integrity, Customer driven, Aspire to the extraordinary and Teamwork are the values, chosen by all the General Cable associates, we stand for and that will secure our long-term future.

These values find expression in an individual behavior that we expect to be exemplary, in order to preserve the quality of our working relationships with customers, suppliers and all interested parties. This behavior is described in the form of action principles detailed in the Code of Ethics and Business Conduct of General Cable group.

We are convinced that social responsibility is achieved through individual and collective discipline and ethical conduct in applying our rules and processes at all levels of our organization. The ethical charter is a duty for every associate and partner (suppliers, contractors ...).

In view of the special nature of our relationships with suppliers, we have introduced a Sustainable Procurement policy since 2010, leading to obtaining the 'Responsible Supplier Relationships' label from 2013. This policy covers many areas for improvement in which we believe. Monitoring these improvements is an integral part of our Quality, Environment and Health & Safety management system. This charter governs the principles and values of our relationships with suppliers.

I count on each of you to understand, collaborate and adhere to this charter and its principles.

Marie-Thérèse BLANOT
General Manager, Silec Cable SAS

2- Our values

Our current success is not a matter of luck; it is the result of our behavior and our determination to improve every day. The values in which we believe unite us and strengthen our identity. These values engage us to surpass ourselves to achieve excellence. These values, chosen through participatory workshops organized in all the entities of the group, bring us together and reinforce the concept of General Cable - One Company, which consists of working together within a single company.

All employees are invited to respect and promote the following 6 values: Safety, Caring, Integrity, Customer-Driven, Aspire to the Extraordinary and Teamwork.



3- Code of Ethics and Business Conduct

General Cable's Code of Ethics and Business Conduct is intended for all employees of the group and in particular for the employees of Silec Cable SAS. It summarizes the policies and defines the principles and behaviors that we must adopt towards our interlocutors in different situations. It allows us to promote the values of General Cable and to help improve our image through these best practices.

To consult the Code, go to the website:

<http://www.generalcable.com/eu/fr/careers/values/>



ETHICS & COMPLIANCE
PREVENT • DETECT • RESPOND

4- The Sustainable Procurement Policy

The guiding principles

For several years, General Cable has adopted an approach aimed at calling attention to compliance with ethical values, taking safety principles into consideration at all levels, concrete environmental protection plans and a corporate social responsibility attitude.

As a direct consequence of this approach, General Cable signed on the 28th of June 2010, the Charter of Responsible Supplier Relationships, via its French subsidiary, Silec Cable SAS, under the aegis of the French minister for the economy, industry and employment.

Silec Cable SAS is continuing to make progress in this approach and is implementing a Charter for Sustainable Procurement to formalize its own commitments and expectations with regard to suppliers.

This Charter for Sustainable Procurement helps to establish a fair relationship with our suppliers, against a background of mutual trust, based on respect for our different values in terms of ethics, sustainable development, health, safety and corporate social responsibility.

I am counting on everyone's support and involvement to assist us in this approach and I invite our suppliers to adhere to this Charter for Sustainable Procurement, with the joint objective of continuous improvement and progress.

Claire GUERY

Vice President European Procurement

Our commitments:

- o Not take advantage of our position in our relationship with suppliers.
- o Be financially fair to our suppliers and to pay them according to the current laws.
- o Encourage partnerships with strategic suppliers.
- o Lower the mutual dependency risks.
- o Give our suppliers visibility on our business whenever possible, in accordance with our confidentiality objectives.
- o Sign confidentiality agreements with our suppliers.
- o Encourage Procurement from local SMEs whenever possible.
- o Assess and judge suppliers' proposals:
 - on the basis of the Total Cost of Ownership;
 - by allocating a weighting to each supplier's compliance with the undertakings in terms of Ethics, Safety, Environment and Social responsibility.

o Set up a Procurement function to steer the relationship with suppliers, negotiations and contractualizations, with:

- a Procurement process going from prime contractors to buyers, all committed to complying with the code of ethics, by personally signing the General Cable Code of Ethics,
- participants in the process made aware of and trained in the principles of Sustainable Procurement,
 - behaving in an impartial, objective and transparent way,
 - avoiding any situation likely to generate conflicts of interest,
 - committed to:
 - applying the rules for expenditure commitments,
 - refusing corruption,
 - exposing anticompetitive practices,
 - respecting the confidentiality of any information shared,
 - respecting intellectual property,
 - relevant indicators to assure the monitoring of suppliers.

o Provide for an internal mediation pole, to whom suppliers may appeal in case of disputes that are not settled at the level of the Procurement Department, in order to avoid long, costly legal proceedings detrimental to both parties.

Our expectations with regard to our suppliers:

We expect our Suppliers overall to put at their level and in their internal processes regards to their own Suppliers an identical approach in terms of Ethics, Health and Safety, respect for the Environment and Sustainable Procurement:

Performance:

- o Ensure a high level of performance in terms of the quality of products and services and respect of deadlines,
- o Offer competitive alternatives and innovative solutions.
- o Define the advantages / disadvantages of the solutions proposed in Total Cost vision for the final customer.

Social responsibility:

- o Respect the declaration of the International Labour Organization (ILO).
- o Comply with all the prevailing laws and standards of the country where the products are made or the work done.
- o Respect human rights and to ensure that no employee is subjected to harassment, corporal or psychological punishment or any form of abuse.
- o Respect wages and working hours, the prevailing laws, rules and standards of the country, including the minimum wage, overtime and maximum working hours.
- o Refrain from using forced or involuntary labour, and to allow employees to resign after making a request with sufficient advance notice.
- o Not employ children.
- o Respect the employees' right of free association.

Environment:

- o Carry out its activities while respecting the environment and complying with the country's legislation.
- o Avoid and control pollution risks.
- o Improve the management of risks related to the production process.
- o Reduce consumption of energy and consumables, to reduce its waste and to seek compliant optimum recovery sectors and, generally speaking, to reduce its environmental impact.

Health and Safety:

- o Assure good conditions of health and safety in the workplace for employees, in accordance with the legislation of the country.
- o Work on risk analysis in order to organize effective risk management.
- o Supply all products and services in accordance with the quality and safety criteria specified in the contractual documents.

Ethics:

- o Not use any fraudulent means to supply goods and services to General Cable, particularly through anticompetitive agreements aimed at modifying the effect of competition.
- o Report any proven fraudulent or unethical conduct to our internal mediation pole or on our specific website www.thegchelpine.com

Application of the Sustainable Procurement policy in Silec Cable SAS :

Infringements of the present charter may endanger the relationships established with our suppliers. They must all be reported to your immediate superior or to the Vice President European Procurement.

Vice President European Procurement : Claire GUERY
email : cquery@generalcable-fr.com / Tel : +33 (0)1 60 57 30 45

The internal mediation pole is composed of our Legal Manager and our Lawyer.

Legal Manager: Stefan STEENKEN
email : stefan.steenken@nsw.com

Lawyer : Olga ZHELTOVA
email : ozheltova@generalcable-fr.com / Tel : +33 (0)1 60 57 31 40



SILEC CABLE SAS

Rue de Varennes Prolongée, 77876 Montereau Cedex, France

Tel. : +33 1 60 57 30 00 – Fax : +33 1 60 57 30 15

info@generalcable-fr.com

www.generalcable.com/eu/fr